

**RIEBLING & PAYTON**

CRIMINAL DEFENSE AND FAMILY LAW

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June 24, 2024

BY ECF

The Honorable Nelson S. Roman
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601USDC SDNY
DOCUMENT
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DATE FILED: **07/03/2024****Re: *United States v. Joseph Maharaj*, 22 Cr. 18 (NSR)-01**

Dear Judge Roman:

As the Court will recall, my office represents the Defendant, Joseph Maharaj, in the above referenced matter. The Defendant was sentenced and is presently scheduled to surrender on August 9, 2024.

My client has requested that I file the instant request to:

1. seek an extension of the surrender date to November 11, 2024; and.
2. seek permission to travel out-of-state to Pennsylvania from July 2, 2024 to July 7, 2024 and to Florida from August 5, 2024 to August 18, 2024 to visit family.

Specifically, Mr. Maharaj wanted me to convey the following history and information for the Court to consider as part of this request:

"My daughter Juliet Maharaj began experiencing seizures in January 2023. She had never experienced these before. We set up an appointment with a neurologist who ordered a 3 day sleep study to try to identify the cause of the seizures. When this study did not yield the desired results, an MRI was ordered of Juliet's brain.

This MRI identified a pineal gland cyst on the base of Juliet's brain. We sought several opinions from other neurologists and neurosurgeons. We were able to secure a virtual appointment with Dr. Infinger, who is one of the top neurosurgeons related to pediatric pineal gland cysts. Dr. Infinger recommended we do not rush to surgery, and monitor the size of the cyst by following up in 6 months with another MRI.

The next MRI of Juliet's brain revealed the pineal gland cyst had increased slightly in size and also

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revealed a pituitary macroadenoma, a tumor growing on the pituitary gland. We were advised to see Dr. Theodore Schwartz, a neurosurgeon based in New York City specializing in these types of cases. We saw Dr. Schwartz in December 2023.

After reviewing Juliet's case and all of her MRIs, Dr. Schwartz recommended a conservative approach to her case. He advised us to hold off on any potential surgery to remove the pineal gland cyst. He also believed we should revisit the pituitary macroadenoma by having another MRI.

Juliet has suffered severe anxiety related to the uncertainty of her medical issues. She has developed insomnia as a result. She has been prescribed daily anxiety medication, and is seeing a therapist regularly to talk through her fears and anxiety.

Juliet will be having a following up MRI of her brain and consultations with her neurosurgeon and neurologist to review those results in October 2024. I would like to be present for these appointments and decision-making process regarding potential surgery, so I am requesting to postpone my surrender date to November 11, 2024.

Separately, Juliet has also had several appointments with a pediatric rheumatologist due to pain and discomfort in her joints. Bloodwork has revealed elevated ANA levels in Juliet suggesting an autoimmune issue, but an exact diagnosis has not been pinpointed yet."

Should the Court require additional information concerning these requests, the Defendant is prepared to provide such information.

Thank you in advance for your consideration of this request.

Respectfully Submitted,

/s/ Stephen J. Riebling, Jr.
STEPHEN J. RIEBLING, JR.
Attorney for Defendant Maharaj
Tel.: (914)705-4502

Cc: Stephanie Simon, Assistant U.S. Attorney


The Court has reviewed Deft's instant letter, the Govt's response letters, dated July 1, 2024 and July 2, 2024 and the Govt's email to the Court, dated July 2, 2024. After due consideration, Deft's request for an extension of time to voluntarily surrender is GRANTED in part, with objection by the Gov't and the Probation Office and without comment by Pretrial Officer Abbott, such as Deft. is GRANTED until 12 noon on Sept. 13, 2024 to voluntarily surrender to the BOP designated facility or, if not designated, the U.S. Marshals Office in White Plains, NY. Deft's request to travel out-of-state to Pennsylvania from July 2, 2024 to July 7, 2024 and to Florida from August 5, 2024 to August 18, 2024 are both GRANTED, without objection by the Government, the Probation Office and Pretrial Officer Abbott. Deft is directed to provide all specific travel arrangements to Pretrial Officer Abbott.

Clerk of Court is requested to terminate the motion at ECF No. 142.

Dated: White Plains, NY

July 3, 2024

SO ORDERED:


HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE